

# **Department of Natural Resources**

DIVISION OF OIL AND GAS

550 W. 7<sup>th</sup> Avenue Suite 1100 Anchorage, Alaska 99501-3560 Main: 907.269.8800 Fax: 907.269.8939

September 21, 2018

Sandy Sears Regulatory and Permitting Advisor BP Exploration (Alaska) Inc. P.O. Box 196612 Anchorage, AK 99519-6612

RE: LONS 70-083, BP Exploration (Alaska) Inc., Prudhoe Bay Unit, N Pad, Snow Fences Unit Plan of Operations Amendment Decision.

Dear Mr. Sears:

The Alaska Department of Natural Resources, Division of Oil and Gas (Division), in accordance with Alaska Statute 38.05 and Alaska Oil and Gas Leasing Regulations (11 AAC 83) grants authorization to conduct activities on state lands as proposed in the Prudhoe Bay Unit (PBU) Plan of Operations (Plan) amendment application dated July 30, 2018 for the above referenced project.

## **Scope:**

BP Exploration (Alaska) Inc. (BPXA) requests authorization to install two approximately 15-foot high snow fences on the southwest and northeast sides of N Pad in the PBU. The installation of the snow fences will reduce the snow accumulation at N Pad, thereby reducing future construction costs, production impacts, and safety hazards. The snow fences will be supported by vertical support members (VSMs) placed into the ground. Ice roads will be used to access the locations for the proposed snow fences. The snow fences will impact approximately 0.02 acres of tundra.

#### Plan activities include:

Southwest fence

- Installation of one approximately 1,500-foot long snow fence adjacent to the southwestern side of N Pad.
- The snow fence will consist of polymer steel composite rails supported by approximately 95, 40-foot long and 17, 45-foot long untreated wooden VSMs placed approximately 15 feet apart. The 40-foot long VSMs will be placed at a depth of approximately 25 feet and the 45-foot long VSMs will be placed at a depth of approximately 30 feet.
- Utilizing sand water slurry to secure VSMs in place in approximately 28-inch diameter holes to accommodate 20-inch diameter VSMs.

#### Northeast fence

- Installation of one approximately 1,500-foot long snow fence adjacent to the northeastern side of N Pad.
- The snow fence will consist of polymer steel composite rails supported by approximately 65, 40-foot long and 11, 45-foot long untreated wooden VSMs placed approximately 15 feet apart. The 40-foot long VSMs will be placed at a depth of approximately 25 feet and the 45-foot long VSMs will be placed at a depth of approximately 30 feet.
- Utilizing sand water slurry to secure VSMs in place in approximately 28-inch diameter holes to accommodate 20-inch diameter VSMs.

#### **Location information:**

PBU N Pad

Meridian: Umiat Township: 11N Range: 13E Section: 8

Lat: 70° 19' 12.334", Long: -148° 54' 44.960" NAD 83

ADL(s): 028282

N Pad is approximately 14 miles northwest from Deadhorse Airport.

#### **Agency review:**

The Division provided a review and comment opportunity for the activities considered for authorization under this decision. The following government entities were notified on August 16, 2018 for comment on the Plan: Alaska Department of Environmental Conservation (ADEC), Alaska Department of Fish and Game (ADF&G), and DNR: Division of Mining, Land & Water (DMLW), Division of Oil and Gas, North Slope Borough, and US Army Corps of Engineers (USACE). The comment deadline was 4:30 pm Alaska Time on August 30, 2018. No comments were received.

#### **Conditions/Stipulations:**

- 1. A Status Report for the activities conducted under this approval must be filed with this office on May 1 and November 1 each year, from the date this approval is issued and until a Completion Report is filed with the Division. Failure to file in a timely manner may result in revocation of this approval. The completion report shall contain a statement describing clean-up activities conducted, the method of debris disposal, and a narrative description of known incidents of surface damage.
- 2. The applicant shall defend, indemnify and hold the State of Alaska harmless from and against any and all claims, damages, suits, losses, liabilities and expenses for injury to or death of persons and damage to or loss of property arising out of or in connection with the entry on and use of State lands authorized under this approval by the applicant, its contractors, subcontractors and their employees.
- 3. Amendments and modifications to this approval require 15-day advance notice and must be approved in writing by the Department of Natural Resources.
- 4. The applicant shall inform and ensure compliance with any and all conditions of this approval by its employees, agents and contractors, including subcontractors at any level.

- 5. The Commissioner of the Department of Natural Resources may require that an authorized representative be on-site during any operations conducted under this approval. This stipulation is required to ensure that the Divisions of Oil and Gas, and Mining, Land and Water meet their statutory responsibilities for monitoring activities taking place on state-owned lands.
- 6. Rehabilitation shall be completed to the satisfaction of the Commissioner.
- 7. Tundra travel on or across Native land claims is not authorized under this approval. The applicant shall consult Bureau of Land Management master title plats prior to all operations to ensure surface operations do not cross or impact existing or pending native allotment claims. The purpose of this stipulation is to avoid trespass and/or damage to in-holdings on state-owned lands.
- 8. Notification. The applicant shall notify the Department of Natural Resources of all spills that must be reported under 18 AAC 75.300 under timelines of 18.AAC 75.300. All fires and explosions must be reported to DNR immediately. The DNR 24-hour spill report number is (907) 451-2678; the fax number is (907) 451-2751. The Alaska Department of Environmental Conservation (ADEC) oil spill report number is (800) 478-9300. DNR and ADEC shall be supplied with all follow-up incident reports.

### **Amendment Specific Stipulation:**

9. A certified As-Built survey of the activity shall be provided within one year of placement of the improvement. This As-Built must be both digital and hard copy.

Please attach this amendment approval with the original decision. This unit operations amendment approval is issued in accordance with Alaska Statute 38.05, Alaska Administrative Codes 11 AAC 83.346 and 11 AAC 83.303. The Division reviewed this amendment under the unit regulation for the Plan, 11 AAC 83.346, and considers the factors set forth in 11 AAC 83.303(a) and (b). The amendment was also evaluated against the PBU agreement for conformance.

A person affected by this decision may appeal it, in accordance with 11 AAC 02. Any appeal must be received within 20 calendar days after issuance of the decision, as defined in 11 AAC 02.040(c) and (d) and may be mailed or delivered to the Commissioner, Department of Natural Resources, 550 W 7<sup>th</sup> Avenue, Suite 1400, Anchorage, Alaska 99501; faxed to 1-907-269-8918, or sent by electronic mail to dnr.appeals@alaska.gov. This decision takes effect immediately. If no appeal is filed by the appeal deadline, this decision becomes a final administrative order and decision of the department on the 31<sup>st</sup> day after issuance. An eligible person must first appeal this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. A copy of 11 AAC 02 may be obtained from any regional information office of the Department of Natural Resources.

This approval signifies only that the State of Alaska has no objection to the operations outlined in the Plan amendment application. It does not constitute certification of any property right or land status claimed by the applicant nor does it relieve the applicant of responsibility to obtain approvals or permits from other persons or governmental agencies that may also be required. All

stipulations contained in the original lease and subsequent Plan approvals remain in full force and effect.

If activities have not commenced, this approval expires on September 21, 2021. Failure to comply with the terms and conditions outlined in the lease, the attached stipulations, and this authorization may result in revocation of this unit operations approval.

Any questions or concerns about this amendment may be directed to Natural Resource Specialist James Hyun at 907-269-8885 or emailed to james.hyun@alaska.gov.

Sincerely,

Nathaniel Emery

Natural Resource Specialist

Attachments: Figure(s) 1-3

ecc: DOG: Graham Smith, Nathaniel Emery, Paul Blanche, Mark Henspeter, and SPCO

Records, and Kevin Pike

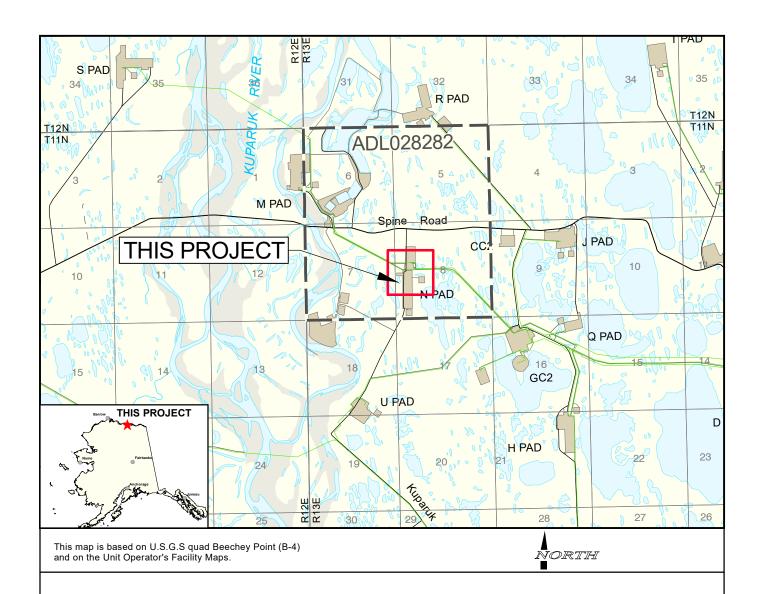
Northannel Gureny

DMLW: Melissa Head, Becky Baird, Henry Brooks, and Kimberley Maher

ADF&G: Jack Winters

ADEC: Laurie Silfven and dec.water.oilandgas@alaska.gov Borough: Jason Bergerson, Josie Kaleak, and Matt C. Dunn

Other: USACE



#### PROJECT LOCATION:

PRUDHOE BAY UNIT - N PAD

NAD83

LAT. = 70° 19' 12.334" / DD 70.320093 LONG. = -148° 54' 44.960" / DD -148.912489

ALASKA STATE PLANE ZONE 4, NAD83

X = 1,774,552.61 FEET Y = 5,967,701.41 FEET

SEC. 8 T11N, R13E UMIAT M.

ADL # 028282

DATUM: MEAN SEA LEVEL

PURPOSE: SNOW FENCES

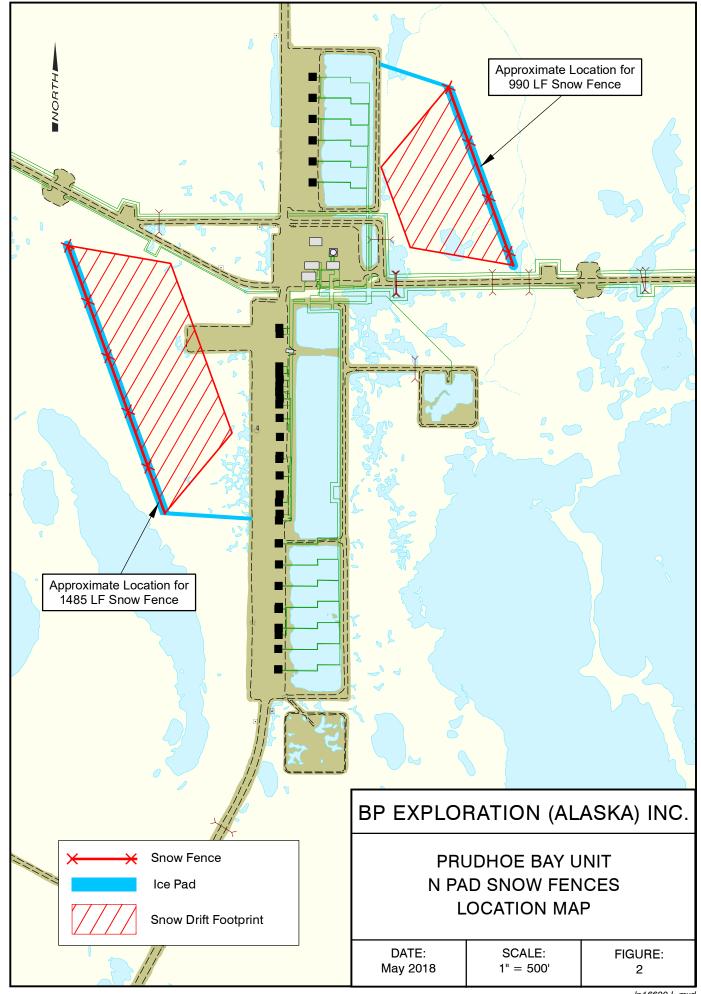
ADJACENT PROPERTY OWNER:

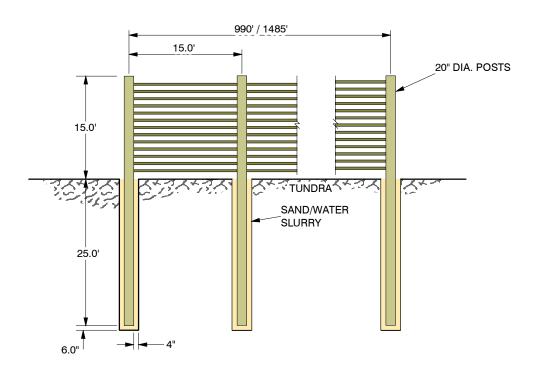
STATE OF ALASKA

# BP EXPLORATION (ALASKA) INC.

PRUDHOE BAY UNIT N PAD SNOW FENCES LOCATION MAP

DATE: SCALE: FIGURE: May 2018 1" = 1 Mile 1





**TYPICAL SNOW FENCE DETAIL** 

BP EXPLORATION (ALASKA) INC.

PRUDHOE BAY UNIT N PAD SNOW FENCES CROSS SECTION

DATE: May 2018 SCALE: NOT TO SCALE FIGURE:

**ALL DIMENSIONS ARE APPROXIMATE**